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September 16, 2015

**VIA ECF**

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
40 Center Street – Courtroom 228  
New York, New York 10007

USDC SDNY  
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Re: Bradford Bodine v. Canaccord Genuity Inc., et al.; No.: 15-cv-3019(JGK)(NKF)

Dear Judge Koetl:

We represent Plaintiff Bradford Bodine in the above-referenced action. We write to respectfully request an adjournment *sine die* of time to oppose Defendants' motion to dismiss. Pursuant to Your Honor's Order dated July 27, 2015 (Dkt. No. 14), the current deadline to oppose Defendants' motion to dismiss filed on August 14, 2015 is September 18, 2015. Over the last month, Plaintiff has worked expeditiously to conduct discovery limited to the issue of subject-matter jurisdiction as permitted by the Court. (Dkt. No. 14). However, the parties disagree over the relevance of many of requested documents and information and need the deposition of Defendant Daniel Daviau in order to oppose Defendants' motion to dismiss. Plaintiff is filing a motion to compel certain documents and the deposition of Mr. Daviau following this request for an extension. In light of the motion to compel, and need time to conduct additional discovery if it is granted, Plaintiff requests that any opposition to Defendants' motion to dismiss be adjourned *sin die* pending resolution of Plaintiff's motion to compel. At which time, we ask the Court to set a new briefing schedule for Plaintiff's opposition and Defendants' reply. This is the first request for an extension of the motion to dismiss briefing scheduling and counsel for Defendants consented to this request.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

Bryan L. Arbeit

A PRE-MOTION CONFERENCE WILL  
BE HELD ON WEDNESDAY, SEPTEMBER 23,  
2015, AT 12:30PM.  
SO ORDERED.

Jn6/Kelley  
9/17/15 N S O J